

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JANE DOE,

Plaintiff,

v.

HILLSTONE RESTAURANT GROUP,
INC. D/B/A R+D KITCHEN,

Defendant.

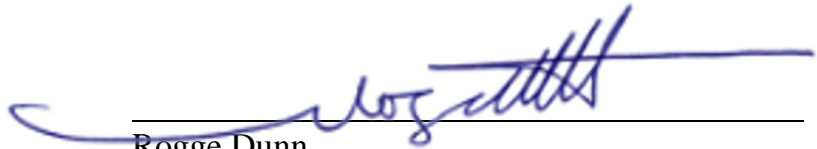
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C.A. No. 3:20-CV-01151-M

DEFENDANT’S MOTION TO REMAND AND BRIEF IN SUPPORT

CERTIFICATE OF CONFERENCE

On May 8, 2020, at approximately 7:39 p.m., the undersigned emailed counsel for Plaintiff, Brent Walker and Charla G. Aldous, to confer whether they oppose this Motion. Attached as Exhibit A are the “read receipts.” A second email was sent at 9:00 p.m. As of this filing we have not received a response. We will amend this certificate of conference if a response is received.



Rogge Dunn

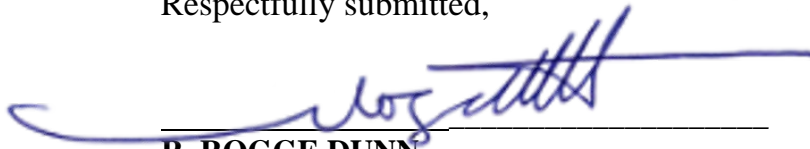
Defendant Hillstone Restaurant Group, Inc. d/b/a R+D Kitchen (hereinafter

“Defendant”) files this Motion to Remand and Brief in Support (the “Motion”), and states:

1. On May 7, 2020, Plaintiff Jane Doe (hereinafter “Plaintiff”) filed suit against Defendant in the District Court of Dallas County, Texas. That same day, Defendant timely removed this case to federal court.

2. Defendant no longer wishes to maintain this action in federal court, and therefore files this Motion seeking to remand this case back to state court. Accordingly, Defendant respectfully requests that the Court enter the Order of Remand submitted herewith and remand this case to the District Court of Dallas County, Texas.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Rogge Dunn', is written over a horizontal line.

R. ROGGE DUNN

Texas Bar No. 06249500

E-mail: Dunn@trialtested.com

GREGORY M. CLIFT

State Bar No. 00795835

E-mail: clift@roggedunngroup.com

ROGGE DUNN GROUP, PC

500 N. Akard Street, Suite 1900

Dallas, Texas 75201

Telephone: (214) 888-5000

Facsimile: (214) 220-3833

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on all counsel of record listed below via the Court's e-filing system on May 8, 2020:

Charla G. Aldous
caldous@aldouslaw.com
Brent R. Walker
bwalker@aldouslaw.com
Aldous\Walker, LLP
4311 Oak Lawn Ave., Suite 150
Dallas, TX 75219

VIA ECF

Chelsea Priest
Law Clerk to Honorable Chief Judge
Barbara M.G. Lynn
United States District Court for the
Northern District of Texas

VIA EMAIL:
Chelsea_Priest@txnd.uscourts.gov



Rogge Dunn